



1150 18th Street, NW
Suite 700
Washington, DC 20036

p. 202/872 5500
f. 202/872 5501

August 1, 2011

Mr. Jon Boyens
Senior Advisor, Computer Security Division
National Institute of Standards and Technology
US Department of Commerce
100 Bureau Drive, Stop 8930
Gaithersburg, MD 20899

Dear Mr. Boyens:

I am writing on behalf of the members of the Business Software Alliance (BSA)* in response to the Request for Public Comments published in the Federal Register under Docket No. 110527305-1303-02 by the Department of Commerce regarding the Green Paper on Cybersecurity, Innovation and the Internet Economy.

As a supplement to this submission, we are working diligently to craft a fuller response to the Request for Public Comments. We applaud the Department's recognition in the Green Paper of the importance of innovation not only to American prosperity and competitiveness but also to our Nation's and the world's global cybersecurity.

We believe that the Green Paper's approach is fundamentally the right one. To secure the large portion of the economy that's not critical infrastructure, we need an approach that is non-regulatory, flexible, and based on incentives. It should promote innovation and the adoption of global industry standards and generally-accepted industry practices.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Katherine B. McGuire", is written over the typed name.

Katherine B. McGuire
Vice President, Government Relations

**The Business Software Alliance (www.bsa.org) is the leading global advocate for the software industry. It is an association of nearly 100 world-class companies that invest billions of dollars annually to create software solutions that spark the economy and improve modern life. Through international government relations, intellectual property enforcement and educational activities, BSA expands the horizons of the digital world and builds trust and confidence in the new technologies driving it forward.*